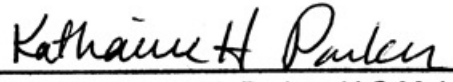


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The Chrysler Building
405 Lexington Avenue | New York, NY 10174-0208
blankrome.com

Phone: (212) 885-5148
Fax: (917) 591-7897
Email: dsakel@blankrome.com

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.

3/29/2018

March 26, 2018

VIA ELECTRONIC MAIL

The Honorable Katherine H. Parker
United States Magistrate Judge
United States District Court – S.D.N.Y.
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

**Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,
Case No. 15-CV-5345 (AJN) (KHP)**

Dear Judge Parker:

We represent Triadou SPV S.A. (“Triadou”) and write to respectfully request that the Court accept for filing under seal the enclosed reply letter in further support of Triadou’s motion to compel the production of a document that was clawed back by non-party Kevin Meyer. As required by Paragraph III(e) of the Court’s Individual Practices, the accompanying email includes a version of Triadou’s reply letter to compel remain under seal subject to the Court’s approval (labeled “To be filed under seal”), and a version of the reply letter with highlights reflecting proposed redactions, to be filed publicly (labeled “To be filed publicly”). Pursuant to the Court’s rules, Triadou will electronically file the proposed redacted version of its reply letter.

Triadou respectfully requests the sealing of its reply letter because, like its opening letter-motion, the reply letter references the contents of a document that Mr. Meyer, a non-party, has clawed back based on a claim of privilege. Additionally, the Stipulated Protective Order and Federal Rules of Civil Procedure 26(b)(5)(2) and 45(e)(2)(B) require motions such as this to be filed under seal. (ECF 253, ¶ 16).

In accordance with the Federal Rules of Civil Procedure, the Stipulated Protective Order, and the Court’s prior orders granting sealing of motions and exhibits in connection with discovery-related motions, Triadou respectfully requests that its reply letter in further support of its motion to compel be filed under seal.

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The Honorable Katherine H. Parker
March 26, 2018
Page 2

Respectfully submitted,

s/ Deborah A. Skakel
Deborah A. Skakel

cc: All Counsel of Record (*via* email)
Peter Guirguis, Counsel for Non-Party Kevin Meyer (*via* email)
Maria Garcia, Counsel for Non-Party Kevin Meyer (*via* email)